

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SUSAN PINSKY, : ECF
Plaintiff, : 07 Civ. 3328 (CM) (HP)
- against - : **DEFENDANT'S NOTICE OF
MOTION FOR A STAY OF
DISCOVERY PURSUANT TO
FED. R. CIV. P. 26(c)**
JP MORGAN CHASE & CO., :
Defendant. : -----X

PLEASE TAKE NOTICE that, upon the Complaint, filed March 27, 2007 in the Supreme Court of the State of New York, County of New York, Defendant's Amended Answer, filed June 4, 2007, the annexed Affidavit of Frederic L. Lieberman, sworn to September 20, 2007, the accompanying memorandum of law, and all the prior pleadings and proceedings heretofore had herein, Defendant JPMorgan Chase Bank, N.A., incorrectly named herein as JPMorgan Chase & Co., by and through its attorneys, the JPMorgan Chase Legal and Compliance Department, Frederic L. Lieberman, Assistant General Counsel, will move this Court, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order pursuant to Fed. R. Civ. P. 26(c), staying discovery and extending sine die the dates set in the Consent Scheduling Order, filed June 29, 2007, pending determination of Defendant's motion for summary judgment, and for such other relief as this Court deems just and proper.

Dated: September 20, 2007

Yours, etc.,

**JPMORGAN CHASE LEGAL AND
COMPLIANCE DEPARTMENT**

By:


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